

**Commonwealth of Kentucky**  
**Division for Air Quality**  
**PERMIT STATEMENT OF BASIS**

Synthetic Minor Draft Permit No. F-99-026  
HARTCO HARDWOOD FLOORING, L.P.  
SOMERSET, KY.  
December 14, 1998  
JIM MORSE, REVIEWER  
Plant I.D. # 105-3460-0074  
Application Log # F927

**SOURCE DESCRIPTION:**

HARTCO makes prefinished plywood veneer strip flooring. The source has its own veneer mill where veneer is sliced and dried. Pieces are then sorted, edged, and spliced by glueing to form sheets. Sheets are laminated (glued) onto a two-ply base to form a three-ply hardwood veneer plywood. This plywood is ripped into strips of either 2.5 or three inches wide, sanded and sealed. Sides and ends are prepared, then strips are stained, sealed, and topcoated. Finished pieces are then graded and packed for shipment.

All woodworking particulate is controlled by a combination of five Pneumafil baghouses each with a manufacturer's guarantee of 99.6% control efficiency of particles sized 10 microns or greater.

Secondary control is provided by a cyclone at 80% control efficiency. Sawdust captured in the baghouses is burned in two 16.74 mmBTU/hr boilers.

All finish is applied by roll coating.

**COMMENTS:**

Due to the small percentage of particulate sized 10 microns or less in wood dust, and the fact that we consider emissions after the baghouse, the woodworking operations are considered to be an insignificant activity. Regulation 401 KAR 59:010 will apply.

Emissions from the two wood-fired boilers are regulated by Regulation 401 KAR 59:015. Emission factors come from AP-42, with adjustments to BTU/lb made to account for the fact that all wood is kiln-dried to approximately 8% moisture.

No regulation applies to VOC emissions from coatings, limits are imposed to convey synthetic minor status to the source.

Emission factors were provided by the permittee, using a material balance. The writer has reviewed the information provided and concurs with those calculations.

**PERIODIC MONITORING**

Opacity and particulate are assumed to meet limits when controls are in place and functioning. PM controls are monitored by visual inspection once per shift.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The permittee has elected to control VOC emissions in order to attain synthetic minor status. VOC emissions will be limited to less than 230 tons per rolling 12 month total.

The source will still be major for HAP's after limiting VOC's.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.